

Remarks

Upon entry of the foregoing Amendment, claims 1-7, 10-19, 22-31, and 34-37 are pending in the application. Claims 1, 13, 25, and 37 have been amended, and claims 8, 9, 20, 21, 32, and 33 have been cancelled. No claims have been added. Applicants believe that this Amendment does not add new matter. In view of the foregoing Amendment and following Remarks, allowance of all the pending claims is requested.

Rejection Under 35 U.S.C. § 101

The Examiner has rejected claims 13-24 under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. Applicants traverse this rejection as the claims are directed towards statutory subject matter. However, solely in an effort to expedite prosecution, independent claim 13 has been amended. Accordingly, the Applicants request that the rejection of claims 13-24 be withdrawn.

Rejection Under 35 U.S.C. § 102

The Examiner has rejected claims 1-37 under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,591,377 to Evoy ("Evoy"). Applicants traverse the rejection for *at least* the reason that Evoy does not disclose, teach, or suggest all of the claim features. Nevertheless, independent claims 1, 13, 25, and 37 have been amended to incorporate subject matter previously presented in claims 8, 9, 20, 21, 32, and 33, respectively. The claims as amended are not disclosed, taught, or suggested by the references relied upon by the Examiner.

For example, claim 1 recites, *inter alia*, the feature of:

replacing each selected secondary parameter instance from the first object with the primary parameter instance from the second object and the non-dependent portion from the selected secondary parameter instance from the first object.

The Examiner alleges that Evoy (col. 7, lines 35-40) discloses the foregoing feature. The cited passage is reproduced below:

The result of this compare operation is that any changes, additions or deletions of objects and their values between the two snapshots is marked out in the snapshot currently held by the map objects.

The foregoing passage appears to disclose marking differences between two snapshots. However, Evoy appears to be *silent* with regard to replacing each selected secondary parameter instance from the first object, as recited in claim 1. For *at least* the reason that Evoy fails to disclose, teach, or suggest all of the claim features, the rejection of claim 1 is improper and must be withdrawn. Claims 13, 25, and 37 include features similar to those discussed above with regard to claim 1. Hence, the rejection of those claims is improper and must be withdrawn. Claims 2-7, 10-12, 14-19, 22-24, 26-31, and 34-36 depend from and add features to one of claims 1, 13, and 25. Hence the rejection of these claims is likewise improper and must be withdrawn.

Conclusion

Having addressed each of the foregoing rejections, it is respectfully submitted that a full and complete response has been made to the outstanding Office Action and, as such, the application is in condition for allowance. Notice to that effect is respectfully requested.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

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